

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:17-CV-11653-ADB

_____)
JOHN DOE1 and JANE DOE1, on behalf of)
their minor child B.G., JOHN DOE2)
AND JANE DOE2, on behalf of their minor)
minor child, A.R., JOHN DOE3 and JANE)
DOE3, on behalf of their minor children)
S.M. and W.M. , JOHN DOE4 and JANE)
DOE4, on behalf of their minor child, J.K.,)
JOHN DOE5 and JANE DOE5, on behalf)
of their minor child J.M.,)
)
)
)
Plaintiffs,)
)
v.)
)
CITY OF BOSTON, BOSTON PUBLIC)
SCHOOLS,)
Defendants.)
_____)

**ASSENTED-TO MOTION FOR COURT APPROVAL OF SETTLEMENT FOR MINOR
PLAINTIFFS**

Now come the plaintiffs, with the assent of the defendants, in the above-entitle action and request that this Court approve the settlement agreement reached by the parties in accordance with M.G.L. Ch. 231, § 140C ½, Attached as Exhibit A are the settlement summaries for each of these plaintiffs. In support of this motion, the Parties assert that:

1. The Plaintiffs' claims arise from the alleged sexual and physical assaults, threats and harassment perpetrated by a minor student on his peers at the Mission Hill K-8 School ("Mission Hill") over a span of September 2014 through November 2016.

2. The parties successfully mediated the dispute with Chief Magistrate Judge Kelley for a total amount of six hundred fifty thousand dollars (\$650,000). The parties agreed to have Chief Magistrate Judge Kelley allocate the total settlement among the plaintiffs. The interested parties agree that the proposed settlement is a fair and reasonable resolution of this disputed liability and injury claim and settlement of this matter is in the plaintiffs' best interest.

THEREFORE, the plaintiffs, with the assent of the defendants, request that this Court approve the settlement which is in the best interest of the incapacitated Plaintiffs.

Respectfully submitted,

Plaintiffs,

Assented to:

Defendants,

CITY OF BOSTON & BOSTON PUBLIC
SCHOOLS

JOHN DOE1, JANE DOE1, B.G., JOHN DOE2,
JANE DOE2, A.R., JOHN DOE3, JANE DOE3,
S.M., and W.M., JOHN DOE4, JANE DOE4, J.K.,
JOHN DOE5, JANE DOE5 AND J.M

By their attorneys,

By its attorney,

/s/ Daniel T.S. Heffernan

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Dated: August 20, 2021

EXHIBIT A

SETTLEMENT SUMMARIES FOR INDIVIDUAL PLAINTIFFS

B.G.

One hundred and thirty-five thousand dollars (\$135,000.00), with attorney's fees in the amount of forty-five thousand dollars (\$45,000), litigation expenses of one thousand, four hundred seventy-two dollars and thirty-three cents (\$1,472.33) with a net amount recovered on behalf of B.G. in the sum of eighty-eight thousand, five hundred twenty-seven dollars and sixty-seven cents (\$88,527.67).

A.R.

One hundred and thirty-five thousand dollars (\$135,000.00), with attorney's fees in the amount of forty-five thousand dollars (\$45,000), litigation expenses of one thousand, four hundred seventy-two dollars and thirty-three cents (\$1,472.33) with a net amount recovered on behalf of A.R.. in the sum of eighty-eight thousand, five hundred twenty-seven dollars and sixty-seven cents (\$88,527.67).

S.M.

Seventy-five thousand dollars (\$75,000), with attorney's fees in the amount of twenty-five thousand dollars (\$25,000), litigation expenses of eight hundred seventeen dollars and ninety-six cents (\$817.96) with a net amount recovered on behalf of S.M. of the sum of forty-nine thousand, one hundred eighty-two dollars and four cents (\$49,182.04).

W.M.

Eighty-five thousand dollars (\$85,000), with attorney's fees in the amount of twenty-eight thousand, three hundred thirty-three thousand dollars and thirty-three cents (\$28,333.33), litigation expenses of nine hundred twenty-seven dollars and two cents (\$927.02) with a net amount recovered on behalf of W.M. of the sum of fifty-five thousand, seven hundred thirty-nine dollars and sixty-five cents (\$55,739.65).

J.K.

One hundred twenty thousand dollars (\$120,000), with attorney's fees in the amount of forty thousand dollars (\$40,000), litigation expenses of one thousand, three hundred eight dollars and seventy-three cents (\$1,308.73), with a net amount recovered on behalf of J.K. of the sum of seventy-eight thousand, six hundred ninety-one dollars and twenty-seven cents (\$78,691.27).

J.M.

One hundred thousand dollars, with attorney's fees in the amount of thirty-three thousand, three hundred thirty-three dollars and thirty-three cents (\$33,333.33), litigation expenses of one thousand, ninety dollars and sixty-one cents (\$1,090.61), with a net amount recovered on behalf of J.M. of the sum of sixty-five thousand, five hundred seventy-six dollars and five cents (\$65,576.05).